

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: : Chapter 11  
: Case No. 08-13555 (SCC)  
LEHMAN BROTHERS HOLDINGS INC., *et al.*, :  
: Debtors. :  
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**SO ORDERED STIPULATION CONCERNING LIST OF NON-OBJECTING  
PARTIES ANNEXED AS EXHIBIT A TO THE ORDER GRANTING MOTION  
TO ALLOW DISCLOSURE OF THE DERIVATIVE QUESTIONNAIRES  
PURSUANT TO SECTION 107(a) OF THE BANKRUPTCY CODE**

WHEREAS, this Court having entered an order, dated June 9, 2015 [Dkt. No. 49936] (the “DQ Order”), approving the Motion for an Order to Allow Disclosure of the Derivative Questionnaires Pursuant to Section 107(a) of the Bankruptcy Code (the “Motion”),<sup>1</sup> dated March 19, 2015, filed by (i) Lehman Brothers Holdings Inc., as Plan Administrator under the Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings Inc. and Its Affiliated Debtors, and on behalf of its affiliates (collectively, “Lehman”), and (ii) the Official Committee of Unsecured Creditors (the “Creditors Committee,” and together with Lehman, “Movants”); and

WHEREAS, Landesbank Baden-Württemberg (formerly Sudwestdeutsche Landesbank Girozentrale and successor in interest to Landesbank Rheinland-Pfalz Girozentrale) (“Landesbank”) having contacted Movants and notified them that Landesbank filed a joinder [Dkt. No. 49116] to two objections to the Motion, and thus was erroneously included in the list of Non-Objecting Parties annexed as Exhibit A to the DQ Order; and

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<sup>1</sup> Unless otherwise defined herein, capitalized terms used herein shall have the meanings ascribed thereto in the Motion.

WHEREAS, Movant having agreed (a) to amend the list of Non-Objecting Parties by this So Ordered Stipulation, and (b) that Landesbank shall be treated as an Objecting Party under the DQ Order.

**NOW THEREFORE IT IS HEREBY STIPULATED AND AGREED** that Exhibit A to the DQ Order shall be deemed amended to delete Landesbank from the list of Non-Objecting Parties, and Landesbank henceforth shall be treated as an Objecting Party under the DQ Order.

LEHMAN BROTHERS HOLDINGS INC.  
AND CERTAIN OF ITS AFFILIATES

/s/ Peter J. Behmke  
Turner P. Smith  
L.P. Harrison 3rd  
Peter J. Behmke  
CURTIS, MALLET-PREVOST, COLT  
& MOSLE LLP  
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New York, New York 10178

OFFICIAL COMMITTEE OF  
UNSECURED CREDITORS OF LEHMAN  
BROTHERS HOLDINGS INC.

/s/ Scott C. Shelley  
Andrew J. Rossman  
Diane C. Hutnyan  
Scott C. Shelley  
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LANDESBANK BADEN-  
WURTTEMBERG

/s/ Douglas P. Bartner  
Douglas P. Bartner  
Stacey L. Corr-Irvine  
SHEARMAN & STERLING, LLP  
599 Lexington Avenue  
New York, NY 10022

**SO ORDERED:**

Dated: July \_\_\_\_, 2015  
New York, NY

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HONORABLE SHELLEY C. CHAPMAN  
UNITED STATES BANKRUPTCY JUDGE